

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C.

FCC MAIL SECTION

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In the matter of)
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Redevelopment of Spectrum to)
Encourage Innovation in the)
Use of New Telecommunications)
Technologies)

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ET Docket No. 92-9

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TO: The Commission

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

COMMENTS OF CORN BELT POWER COOPERATIVE

Pursuant to Section 1.415 of the Commission's Rules, Corn Belt Power Cooperative hereby respectfully submits its comments on the Notice of Proposed Rulemaking (NPRM), FCC 92-20, released February 7, 1992, in the above captioned matter.

I. Introduction

Corn Belt Power Cooperative is a Generation and Transmission Cooperative serving 27 counties or approximately 16,000 square miles across northern and central Iowa. We provide power to approximately 50,000 rural and municipal customers.

We licensed our first six 2 GHz microwave stations in 1959. We presently own and operate 20 microwave stations, of which all are in the 1.85 - 2.2 GHz microwave bands.

II. The 1850-2200 MHz Band Should Not Be Reallocated For The Creation Of A Spectrum Reserve

Corn Belt Power Cooperative opposes a reallocation of spectrum in the 1850-2200 MHz band for the creation of a spectrum reserve for development of emerging technologies. Our communication personnel have studied alternatives to our 1850-2200 MHz microwave system.

Leased circuits:

With the breakup of the Bell system, service deteriorated dramatically while costs skyrocketed. Because of the poor reliability, we have been forced to replace all leased circuits with other means.

Fiber optics:

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Our estimated cost to install is in excess of ~~list~~ **AB CODE** per mile. It is also susceptible to a cable cut or failure which may take hours or days to restore. We would need to construct a looped configuration to retain the same reliability we now have with our microwave system. Replacement cost with fiber is in excess of 4 million dollars. Fiber optics are cost prohibitive.

6 GHz microwave:

We would try to migrate to the 6 GHz band if spectrum is available. It will require a redesign and strengthening of our existing towers, space diversity and equipment to attain the same reliability we now have. Replacement costs with 6 GHz is estimated to be 1.2 million dollars.

We have serious doubts as to the economic viability of PCN or any other emerging technologies in our rural area. We do not even have full cellular coverage in our area.

Corn Belt Power Cooperative urges the Commission to consider alternate bands, such as the 2500-2690 MHz "wireless cable" band as a possible "home" for the spectrum reserve.

III. Actions To Be Taken If 2 GHz Band Is Reallocated

Corn Belt Power Cooperative urges that if the 2 GHz band is reallocated for emerging technologies, the Commission should grant indefinite co-primary status for all existing 2 GHz microwave systems and should permit reasonable system modifications and expansions.

Corn Belt Power Cooperative urges the Commission to adopt rules allowing for the use of voluntary negotiations between licensed users and new service providers.

Under no circumstances should new service in the band be authorized on an unlicensed basis or any other basis where existing users would be unable to secure reimbursement for relocation or identify interference sources.

IV. The 1710-1850 MHz Band Should Be Made Available For Displaced 2 GHz Users

Corn Belt Power Cooperative urges the FCC and the National Telecommunications and Information Administration (NTIA) to commence discussions to open the 1700-1850 MHz Federal government spectrum for use by displaced 2 GHz users on a co-primary, non-interference basis.

V. The FCC Should Open The 4, 6, and 11 GHz Bands For Private Microwave Use

Corn Belt Power Cooperative supports the Utilities Telecommunications Council "Petition for Rulemaking," filed March 31, 1992, to make the 4 GHz, 6 GHz, and 11 GHz common carrier bands available for routine licensing in the Private Operational Microwave Service under Part 94, and to adopt appropriate channeling plans and technical standards to ensure that these bands are adequate to meet the needs of existing and future private microwave systems.

VI. Conclusion

Corn Belt Power Cooperative is opposed to the use of the 1850-2200 MHz band as spectrum reserve. If the 1850-2200 MHz band is reallocated for emerging technologies, existing licenses must retain indefinite co-primary status.


We are in support of a market based approach to negotiations between existing users and new technology licenses.

Wherefore, The Premises Considered, Corn Belt Power Cooperative respectfully requests the Commission to consider these Comments in acting on the subject Notice of Proposed Rule Making.

Respectfully submitted,

CORN BELT POWER COOPERATIVE

By:


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May 28, 1992

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